Date: 12/20/2004

First Name: Mike

Last Name: Gabler

Address: P.O. Box 73

City: Alpine

State: CA

Zip Code: 91903

Topic: Biological Resources - Marine

Comments: As an avid deep-sea fisher I appreciate the steps that BHP is taking with

the Cabrillo Port to ensure that marine life are not adversely affected by their facility. Many other places in the world don't care about how their plants affect the marine life. I like it that BHP is conducting business

admirably.

2004/G370

G370-1

Date: 12/17/2004

First Name: Silas

Last Name: Gaither

Address: 1234 21st St.
City: Santa Monica

State: CA

Zip Code: 90404

Topic: Socioeconomics

Comments: As a California taxpayer who opens high electricity bills and has seen the

California blackouts firsthand, I support Cabrillo Port. Any project that brings jobs and pumps money into the local economy while providing immediate energy solutions should be supported. Cabrillo Port provides

California with much needed natural gas while being aesthetically

pleasing and a clean solution to our energy needs.

2004/G137

G137-1

Date: 12/20/2004

First Name: Mike

Last Name: Galea

Address: P.O. Box 310-204

City: Guatay

State: CA

Zip Code: 91931

Topic: Socioeconomics

Comments: I work for my family's machine shop. We specialize in high-precision,

custom machined parts for the shipping industry. A project like the Cabrillo Deepwater Port could provide a lot of quality work for our

company. I am sure that a lot of California's small businesses will benefit from the construction and operation of this facility, creating jobs and a

healthier economy for California.

2004/G321

G321-

Date: 12/19/2004

First Name: Enola

Last Name: Gates

Address: 6607 Markley City: Carmichael

State: CA

Zip Code: 95608

Topic: Other/General Comment

Comments: We need to start thinking more seriously about California's energy future.

I'm glad to see utilities like Edison and the LADWP investing in green power. Renewable energy is very expensive. Until we see these products becoming more accessible, we have to be stewards of the land. Natural gas is one of the cleanest burnig fossil fuels available. It has to be done in

an affordable way. That's why we need to support Cabrillo Port and

BHPB.

2004/G197

G197-1

USC6-2004-16877-701 Source:

USCG Docket

Date:

I support the authority for this project. It appears that this company has a commitment to the environment and the project appears to benefit California and, specifically, Ventura County.

G444-1

12/19/2004 Date:

First Name: Margaret

Last Name: Gibson

1504 A Sierra Vista Address:

City: Alhambra

CA State:

Zip Code: 91801

Other/General Comment Topic:

Comments: The City of Malibu will be 20 miles away form teh westnmost point of

Cabrillo Port. Some parts of Malibu are closer to the Ports of Los Angeles

and Long Beach. It ridiculous that some Malibu locals are more

concerned with the environmentally friendly development of Cabrillo Port a port they will most likely never even know exists - than they are about the massive development along Los Angeles. It seems to me that some people are quick you judge based on false information. I on the other hand have done my research and believe this is a great project all around that should be supported by everyone in the state. I appreciate the

opportunity to comment.

2004/G196

G196-1

I am strongly in favor of the Cabrillo port project. As our domestic energy supplies decrease, projects like this will ensure we have a safe, reliable source of energy. I respectfully ask for this project to be approved.

G497-

+5624959798

308810



DEPT. OF TRANSPORTATION DOCKETS

301 Ocean Boulevard, Suite 1510, Long Beach, CA 908024 DEC 20 P 2: 51
Tel: 562.495.9886 • Fax: 562.495.9798

December 16, 2004

VIA FACSIMILE AND CERTIFIED MAIL 202-493-2251

Docket Management Facility
U.S. Department of Transportation, Room PL-401
400 Seventh Street SW
Washington, DC 20590-0001

Re:

BHP Billiton Cabrillo Port Liquified Natural Gas Deepwater Port Project

Docket Number, USCG-2004-16877 - 705

To Whom It May Concern:

California LNG Project Corporation, doing business as Sound Energy Solutions ("SES") has proposed to permit, construct, and operate a liquefied natural gas ("LNG") receiving and vehicle fuel terminal ("SES Project") in the Port of Long Beach, California. SES submits the following comments on the Draft Environmental Impact Review/Environmental Impact Statement ("EIR/EIS") for the proposed BHP Billiton Cabrillo Port Liquified Natural Gas Deepwater Port Project ("Project").

SES strongly agrees with the EIR/EIS' comments regarding the region's need for alternative sources of natural gas. EIR/EIS §§ 1.2.1, 1.2.2. However, the EIR/EIS' Alternatives analysis (§ 3) essentially concludes that offshore LNG receiving terminals (such as the Project), as opposed to onshore LNG receiving terminals, constitute the only viable way to receive and deliver alternate sources of natural gas. Contrary to this conclusion, properly sited and constructed onshore LNG terminals serve as exemplary means to receive and deliver alternate supplies of natural gas (and in SES' case, LNG vehicle fuel) to the marketplace, and will remain important into the future.

While SES agrees with comments in the "purpose and need" section of the EIR/EIS, we have an different view of assertions in the "Alternatives" section. The EIR/EIS states that California's now-repealed (since 1987) LNG Siting Act remains "logically still applicable". EIR/EIS, § 3.3.6.3 (page 3-13, lines 6-8). SES respectfully disagrees with this assertion. Prior to its repeal in 1987, the California LNG Siting Act's requirements may have been considered technically justified based on the knowledge of LNG release consequences at the time. It also may have been considered as justified based on public perceptions and politics of that era. Since 1987, a significant amount of testing, experience, and analysis within the LNG industry and related fields have provided a solid database for risk prevention and siting criteria. The currently applicable laws and regulations reflect the industry's continuous work on minimizing risks and maximizing safety. The proposition that the earlier legislation is "logically still applicable" belies currently applicable

G431-1

G431-2

2004/G431

G431-1

Section 3.3.7.3 contains revised text on this topic.

G431-2

Sections 3.3.7.3 and 3.3.7.4 contain revised text on this topic.

U.S. Department of Transportation, Room PL-401 December 16, 2004 Page 2

federal and international regulations and almost twenty (20) additional years of experience and knowledge.

G431-2 cont

The EIR/EIS further states that "onshore LNG terminals would not substantially avoid or lessen any significant potential effects and would present more potential visual effects, land use conflicts, and risks to public safety because of the proximity to population centers." EIR/EIS, § 3.3.6.3 (page 3-13, lines 21-24). SES respectfully disagrees with this statement as well.

G431-3

G431-4

Each and every operating and proposed LNG receiving terminal presents unique siting considerations, design criteria, and operational parameters. While all must meet or exceed applicable laws and regulations, each project represents unique challenges and opportunities. Visual effects, land use matters, and safety factors are important for every project, but these considerations can and should be tackled differently to suit each project's individual purpose and needs in concert with the surrounding environment. For example, visual effects of an onshore LNG receiving terminal in an industrial port may be minimal and not of concern because of existing tall objects and/or port topography. In an industrial port, the purpose of the port is ship traffic for export, import, and general use. In this context, an LNG ship has no unique features. The risk of any LNG port activity is appropriate for consideration, but falls within the responsibility of the Federal Energy Regulatory Commission, the port authority, and the United States Coast Guard—all of which are expert in evaluating the acceptability of such operations. Other unique factors should also be considered, such as a facility's unique ability to provide vast quantities of LNG vehicle fuel and the inherent benefits that such fuel will have on local and regional air quality.

Thus, a general characterization that onshore terminals would not "avoid" or "lessen" certain factors and concerns, as compared to the Project, is inaccurate and misleading. Onshore siting of LNG receiving terminals has many attributes and unique features. Certain projects may in fact avoid or lessen certain consequences identified in the EIR/EIS. Each project deserves individual consideration, as well as accurate comparison to alternatives.

G431-5

Very truly yours,

THOMAS E. GILES

Executive Vice President and Chief Operating Officer

TEG/z

2004/G431

G431-3

See response to Comment G431-1.

G431-4

Section 4.4.4 discusses aesthetic impacts and mitigation. Section 4.13.4 discusses land use impacts and mitigation. Section 4.2 discusses public safety.

G431-5

See response to Comment G431-1.

Federal Docket No. USCG-2004-16877 State Clearinghouse No.2004021107 CSLC EIR No. 727

Source: Public Meeting - Oxnard PM

Date: 11/30/2004

Comments on section 4.2 public Safety: Hazards and Risk Analysis

The computer models used to generate hazard distances are not validated. Without experimental test of LNG using volumes of 50,00 to 300,000 cubic meters to validate the computer models the numbers generated can not be used to determine hazard distances. G084-1

The computer models are used for example to determine the Maximum Distance to LFL (Lower flammable limit) in Table 4.2.3-3; scenario # 1 1.1 miles for 50,000 cubic meters of LNG, scenario #2 1.1 miles for 100,000 cubic meters of LNG and scenario TA-A 1.6 miles for 300,000 cubic meters of LNG.

The California Coastal Commission, May 24, 1978 Final Report Evaluating and Ranking LNG Terminal Sites report on Page 68 predicted 25 miles to LFL for 125,000 cubic meters of LNG and 12 miles to LFL for 25,000 meters of LNG. On page 67 stated "Federal agencies believe that LNG spill tests to date [1978] have been insufficient to predict the results of large scale spills..." (attachment 1)

There have not been to date any large scale spill test with LNG. Ronald P. Koopman Ph.D. P.E. consultant for BHP Billiton in his LNG Hazards Reaearch Historical Summary, March, 20004 (attachment 2) attempts to use experiments from the 1980s as proof that the present computer models have been validated. The largest LNG test was with 66 cubic meters (10,000 gallons). This is also the largest test I have been able to find.

The FERC report, Consequence Assessment Methods for Incidents Involving Releases from Liquefied Natural Gas Carriers, 1288209 May 13, 2004 states on page iii

"In the particular case of the methods of interest here (i.e. methods for large release from LNG carriers), some important issues include:

- . No release models are available that take into account the true structure of an LNG carrier, in particular the multiple barriers that the combination of cargo tanks and double hulls in current LNG carriers provide
- · No pool spread models are available that account for wave action or currents
- Relatively few experimental data are available for validation of models involving LNG spills on water, and there are no data available for spills as large as the spills considered in this study" [12,500 cubic meters of LNG was the largest spill modeled]

Because of the complexity of LNG spills, it is impossible to accurately predict or model beyond the largest experimental LNG spill. Spill tests of LNG using volumes of 50,000 to 300,000 cubic meters must be done to validate the computer models before the EIS/EIR draft can be certified.

Larry Godwin, Physicist 3830 San Simeon Ave

Oxnard, Ca 93033

2004/G084

G084-1

The Independent Risk Assessment (IRA) has been updated since issuance of the October 2004 Draft EIS/EIR. The lead agencies directed the preparation of the current IRA, and the U.S. Department of Energy's Sandia National Laboratories independently reviewed it, as discussed in Section 4.2 and Appendix C. (Section 4.2, Appendix C1, and Appendix C2 contain additional information on this topic.)

Section 3.3.7.4 discusses the California Coastal Commission's Offshore LNG Terminal Study with respect to locations considered and the criteria used to evaluate offshore locations.

The Project is regulated by the USCG and MARAD under the authority of the Deepwater Port Act. FERC's regulations are prescriptive and standardized to address the general siting of onshore LNG terminals. In contrast, due to various different designs of deepwater ports, the USCG conducts site-specific independent risk and consequence analyses using the most recent guidance and modeling techniques. The guidance used for Cabrillo Port is Sandia National Laboratories' "Guidance on Risk Analysis and Safety Implications of a Large Liquefied Natural Gas (LNG) Spill Over Water." This report recommends a framework for analyses of large LNG spills onto water. It was prepared for the U.S. Department of Energy (DOE), and an external peer review panel evaluated the analyses, conclusions, and recommendations presented.

FINAL REPORT EVALUATING AND RANKING LNG TERMINAL SITES CALIFORMIA COASTAL COMMISSION MAY 24, 1978

improve the LNG terminal's reliability. This could be accomplished in one of three ways: (1) increase the storage capacity by adding a fourth storage tank; (2) add a second berth; or (3) construct a breakwater.

Increasing the storage capacity and adding a second berth would give the system greater flexibility in dealing with lengthy delays and reduce the likelihood of an interruption in the terminal's delivery of natural gas. Constructing a breakwater would increase the number of days tankers could dock by reducing the effect of the waves.

Whether such changes might be needed in the future depends not only on LNG terminal reliability but also on the status of the entire California gas system. Delays in LNG deliveries may not be important if the whole distribution system in the State has adequate storage to provide gas during LNG interruptions, if enough large gas users can switch over to fuel oil, if other gas sources can rapidly increase deliveries or California utilities can "borrow" gas, and, in general, if California high priority gas users are adequately protected with a flexible gas storage and distribution system.

However, the recommended site ranking is based on three storage tanks, one berth, and no breakwaters at the sites, except at Rattlesnake Canyon. A breakwater at the Little Cojo site would have major adverse impacts that would affect the recommended site ranking. Therefore staff proposed the Commission adopt a finding and declaration that if facilities are considered for addition to an approved terminal at some future date, that the least environmentally damaging alternative be selected and that the Coastal Commission have a role in evaluating the alternatives.

F. LNG Safety Risks

The Coastal Commission has not devoted a major effort to evaluate LNG safety risks. The following brief discussion justified considering populations beyond four miles from terminal sites in the site ranking.

There is considerable disagreement and uncertainty about the risks of LNG. The U.S. Department of Energy has testified before Congress that there is a lack of adequate technical information on the way LNG would act if a major unconfined spill occurred. More information seems needed on the rate at which LNG will spread and evaporate, the impact of weather conditions and terrain on vapor cloud dispersion, the probability of vapor cloud ignition, and the amount of radiant energy given off in a major LNG fire.

Federal agencies believe that LNG spill tests conducted to date have been insufficient to predict the results of large scale spills, and the Department of Energy has plans for a five-year, \$50 million research program to carry out larger scale spill tests. For the short term, the Department of Energy is formulating a federal siting policy on LNG, which will likely include requirements for remote terminal siting.

Although the California Legislature established remote siting criteria which limit the number of permanent residents and workers within four miles of a potential LNG site, there is general agreement that a major LNG spill,

FINAL REPORT EVALUATING AND RANKING LNG TERMINAL SITES CALIFORMIA COASTAL COMMISSION MAY 24, 1978

either at the terminal itself or from an LNG tanker, could have serious consequences beyond four miles. The Legislature's four-mile restriction was apparently based on estimates of the skin burn radiation limits from a major fire resulting from a large LNG spill at the terminal. This four-mile criterion does not specifically address the possible travel of an unignited LNG vapor cloud beyond four miles.

The Commission's technical consultant reviewing the models which predict vapor cloud behavior has concluded that, at present, among researchers the Germeles-Drake model is generally accepted as the preferred model. This model predicts possible distances a vapor cloud could travel and be flammable based on the size of the potential LNG spill and the weather conditions. Extremely stable weather conditions, with a slight breeze blowing continuously in one direction, is considered the most dangerous situation because the vapor cloud would move with the wind rather than be rapidly dispersed. Under these stable weather conditions, an unignited vapor cloud formed by a spill of 125,000 cubic meters (or about half the storage capacity of the terminal) could travel as far as 25 miles before being diluted in air enough to no longer be flammable. A 25,000 cubic meter spill (one of five tanks on an LNG tanker) could result in a vapor cloud which could travel about 12 miles and be flammable under stable atmospheric conditions.

Because numerous ignition sources would exist before a potential vapor cloud could travel these distances over land, it is highly likely that the cloud would ignite before it had a chance to dissipate. The resulting fire would quickly burn back to the source of the spill and then be contained to that area.

G. The Federal Regulatory Process

Because the federal government regulates both the importation and the price of natural gas, it has authority to decide when and if an LNG project is needed and where the facilities should be located. Two agencies within the Department of Energy share responsibilities relating to liquefied natural gas. The Economic Regulatory Administration (ERA) reviews the necessity of proposed contracts and reliability of importing LNG from foreign countries. The Federal Energy Regulatory Commission (FERC, formerly the Federal Power Commission) has responsibility for regulating transport and pricing of domestic natural gas in interstate commerce. Since the proposed LNG terminal for California would receive LNG from Indonesia and Alaska, both of these agencies are reviewing an application submitted by Western LNG Terminal Associates.

Until the passage of the LNG Terminal Act of 1977, this application was for Western's proposed site at Oxnard, and the federal proceedings had been reviewing that site. In October 1977, Western amended its federal application by designating Little Cojo as its preferred site because of the new California LNG Terminal Act, which excluded Oxnard due to high population within four miles of the site.

In December 1977, ERA Administrator David Bardin issued Opinion Number One (Opinion and Order on Importation of Liquefied Natural Gas from Indonesia),

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Burro	1980	LING	8	24-39	12-18	Dispersion	DOE
Coyote	1861	ENG	18	3-28	6-19	Combustion, RPT	DOE
Thorney Island	1982 1983 1984	Freon	43	2000 (gas)	Inst - 300	Dispersion, Obstacles	UK HSE
-Desert	1983	Ammonia	4	15-60	7-10	Dispersion	USCG, TFI
Eagle	-1983	N204	9	1-4	0.5-2	Dispersion, Source	USAF
Goldfish	1986	#	9	4	0.1-2	Dispersion, Mitigation	Атосо
Falcon	1987	LNG	5	20-66	9-30	Model Validation	GRI, DOT
Hawk	1988	#	88	0.2	0,02	Mitigation	Mobil
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Source: Public Meeting - Oxnard PM

G085-1

Date: 11/30/2004

Federal Docket No. USCG-2004-16877 State Clearinghouse No.2004021107 CSLC EIR No. 727

Comments on Table 4.2.6-5

The Potential Impact Radius listed of 824 feet for the Center Road Pipeline 36 inch 1,100 PSI pipe needs to be changed to over 1,500 feet. The number is determined from a formula. The formula gives a low number. On August 19, 2004 an El Paso Natural Gas 30-inch transmission pipeline ruptured in Eddy County, New Mexico. The fire killed 12 people; some of them were 1,500 feet from the pipeline. This makes the use of the formula questionable and means that the PIR and other uses of the formula are deliberately made low to limit the high consequence areas.

pory nodici

Larry Godwin, Physicist 3830 San Simeon Ave Oxnard, Ca 93033 G085-1

This topic is discussed in Section 4.2.8.4. The Carlsbad incident was one of several that prompted the DOT PHMSA Office of Pipeline Safety to develop additional requirements regarding pipeline integrity. These requirements have been issued as 49 CFR 192, Subpart O and define how the Potential Impact Radius is determined. Additional information is provided in Appendix C3.

2004/G085

Page 1 of 2

Sholly, Brian

Source: USCG Docket

From: Sent:

To:

Flynn, Louise [LFlynn@comdt.uscg.mil] Monday, December 20, 2004 7:26 AM

Monday, Dec Sholly, Brian

Subject: FW: Cabrillo Port LNG draft comments

From: Kusano, Ken LT

Sent: Monday, December 20, 2004 10:24 AM To: Flynn, Louise; 'dwp@comdt.uscg.mil' Subject: FW: Cabrillo Port LNG draft comments

V/r, KK LT Ken Kusano U.S. Coast Guard Headquarters Deepwater Port Standards Division (G-MSO-5) 202-267-1184

From: charles godwin [mailto:godwinc@earthlink.net]

Sent: Saturday, December 18, 2004 1:00 AM

To: Cy Oggins; Kusano, Ken LT

Subject: Cabrillo Port LNG draft comments

Federal Docket No. USCG-2004-16877

State Clearinghouse No.2004021107

CSLC EIR No. 727

Comments on section 4.2 Public Safety and 4.19 Environmental Justice

The mitigation measures summarized in table 4.19-10 will not protect the residents or minimize the possible effects of an onshore pipeline failure. If there is a pipeline rupture at an HCA (High Consequence Area), the residents there will most likely be dead. Using smoke detectors as a mitigation measure indicates a total lack of understanding of the danger, since smoke detectors will not detect a natural gas leak or a natural gas fire.

The California State Department Of Education requires a risk assessment be done whenever a highpressure pipeline is within 1,500 feet of the property line of a school. Mr. Shaw, Field representative for School Plan Division of the California State Department of Education believes that students in a building 1,500 feet from a 36" 1,100 PSI pipeline rupture would not be safe.

G432-3
The only protection to residents within 1,500 feet of the onshore pipeline is to relocate them beyond 1,500 feet, remove all buildings within 1,500 feet of the pipeline, and purchase the development rights for all land within 1,500 feet of the pipeline. This is the only way to insure that

12/29/2004

2004/G432

G432-1

Impact EJ-1 in Section 4.19.4 has been revised in response to the comment.

G432-2

Section 4.2.8 contains information on safety requirements for pipelines. Section 4.13.1 discusses the proximity of the proposed pipeline routes to residences and schools.

The California Department of Education requires that a risk analysis be performed if an underground pipeline easement is within 1,500 feet of a proposed new school site.

G432-3

the Environmental Justice and public safety impacts will be truly mitigated.

G432-3 cont

Larry Godwin

3830 San Simeon Ave

Oxnard, Ca 93033

- --- charles godwin
 --- godwinc@earthlink.net
 --- EarthLink: The #1 provider of the Real Internet.

Source: Public Meeting - Oxnard PM

G097-1

Date: 11/30/2004

Date: 11

Federal Docket No. USCG-2004-16877 State Clearinghouse No.2004021107 CSLC EIR No. 727

4.18.1.3 Groundwater Resources

This section does not address the impact on saltwater intrusion of the horizontal directional drilling for the shore crossing. The Oxnard Aquifer is believed to be less than 50 feet deep in this area with freshwater springs being fed by the Aquifer.

The City of Oxnard 2020 General Plan addresses the issue of saltwater intrusion: "In general, the aquifers are separated from each other by layers of silt and clay having low permeability. Aquifer mergence exists where the low permeability layer is absent. Mergence areas are important since they offer avenues for polluted water to move from one aquifer to another."

The EIS/EIR cannot be certified until it is determined that the integrity of the aquifers will not be compromised by the horizontal directional drilling. What measures will be required to avoid contaminating any of the aquifers with drilling muds? What measures will be required to prevent breach of the clay layer that would allow an avenue for saltwater intrusion?

Shirley Godwin

3838 San Simeon Ave.

Oxnard, CA 93033

2004/G097

G097-1

Section 4.18.1.3 addresses these issues.

Source: Public Meeting - Oxnard PM

Date: 11/30/2004

Federal Docket No. USCG-2004-16877 State Clearinghouse No.2004021107 CSLC EIR No. 727

4.19.4 Environmental Justice4.6.4 Air Quality4.20.3.5 Air Quality Cumulative Impacts Analysis

The Environmental Justice section of the EIS/EIR does not address all the impacts and therefore is not adequate. This section takes a very narrow view of environmental justice and only considers a small section of the pipeline route past two mobile home parks. All populated areas of Oxnard, especially south Oxnard, along with Port Hueneme and the adjacent county areas, must be studied in regard to air quality. The prevailing wind is onshore. Pollutants from the operation of the FSRU, emissions from the LNG tankers ships and all construction and operational related emissions will be carried over these populated areas affecting low income and minority populations

These populations are already impacted by air pollution from two power generating facilities, the wind blown pollutants from the Halaco slag pile, diesel emissions from ships and trucks servicing the Port of Hueneme, and heavy industry in the Ormond Beach area. The EIS/EIR must evaluate the cumulative impacts of the existing air pollution combined with the new air pollution created by the BHP Billiton project.

The EIS/EIR must address how many additional cases of cancer, asthma and respiratory illness in the affected populations will be caused by the pollution generated by the construction and operation of this LNG project.

Shirley Godwin

3838 San Simeon Ave.

Oxnard, CA 93033

G098-1

Sections 4.19 and 4.2.8.4 discuss this topic.

G098-2

Section 4.6 discusses air quality impacts, and Section 4.19.4 discusses air quality impacts on low income or minority populations.

2004/G098

G098-3

The air quality analysis factors in existing monitoring data to account for existing sources.

G098-4

G098-1

G098-2

G098-3

G098-4

The Project has been modified since issuance of the October 2004 Draft EIS/EIR. See Section 1.4.2 for a summary of Project changes. Section 4.6.1.3 contains revised information on Project emissions and proposed control measures. Section 4.6.4 discusses the health effects attributed to air pollutants and includes revised impacts and mitigation measures.

Source:

USCG Docket

Date: 12-18-04

Sholly, Brian

Flynn, Louise [LFlynn@comdt.uscg.mil]

From: Fly

Sent:

Monday, December 20, 2004 7:25 AM

To: Sholly, Brian

Subject: FW: Cabrillo Port LNG comment

From: Kusano, Ken LT

Sent: Monday, December 20, 2004 10:25 AM To: Flynn, Louise; 'dwp@comdt.uscg.mil' Subject: FW: Cabrillo Port LNG comment

V/r, KK LT Ken Kusano U.S. Coast Guard Headquarters Deepwater Port Standards Division (G-MSO-5) 202-267-1184

From: charles godwin [mailto:godwinc@earthlink.net]

Sent: Saturday, December 18, 2004 9:13 PM

To: Cy Oggins; Kusano, Ken LT Subject: Cabrillo Port LNG comment

Federal Docket No. USCG-2004-16877

State Clearinghouse No.2004021107

CSLC EIR No. 727

2.6 FUTURE PLANS, DECOMMISIONING, AND ABANDONMENT

2.6.2 Offshore Pipelines

2.6.3 Shore Crossing and Onshore pipelines and Facilities

G433-1

2.6.2 and 2.6.3 do not discuss impacts to the environment from either the removal or abandonment, but instead defer studying the impacts for 40 years. There is certainly no discussion of future costs to repair damage to either the onshore areas or the seafloor.

G433-2

Oxnard has experience with a metals recycling company, Halaco, abandoning a huge slag pile and a heavily damaged and degraded site. This company has now declared bankruptcy, and the matter of the cleanup in now in court. The issue of future cleanup of this site, and who would be responsible for the cost, should have been addressed at the time this project was approved. There must not be a repeat of this.

12/29/2004

2004/G433

G433-1

Section 2.8 discusses decommissioning of the FSRU and pipelines, including financial responsibility.

G433-2

The projected FSRU in-service life is a maximum of 40 years. Environmental conditions and specific impacts 40 years from now are not reasonably foreseeable. As noted in Section 2.8, supplemental NEPA/CEQA documentation, which would take into consideration the environmental conditions at the time, would be required prior to the decommissioning of the FSRU. Also as noted in Section 2.8, as part of the license approval, the DWPA requires each applicant to furnish a bond or demonstrate other proof that if the project is abandoned then sufficient monies would be available for either completion or demolition of the project.

2004/G433

It should be clearly stated in the EIS/EIR that BHP Billiton is solely responsible for the environmental cleanup and restoration at the time of decommissioning, and assumes full liability for the cost. At a minimum BHP Billiton must post a bond with accumulating interest to pay for future cleanup and restoration of the effected areas.

G433-2

Shirley Godwin

cont'd

3838 San Simeon Ave.

Oxnard, CA 93033

--- shirley godwin

--- godwinc@earthlink.net

-- EarthLink: The #1 provider of the Real Internet.

12/29/2004

Date: 12/20/2004

First Name: Jerry Last Name: Goetz

Topic: Public Safety: Hazards and Risk Analysis

Comments: The idea that pipelines are going to explode beneath schools is, well,

ridiculous. It's another attempt by our friendly environmentalists to keep any project from approved. I wonder if their offices are powered by natural

gas. It's sad that we use children and schools to fight our grown-up battles. There are high-pressured gas lines, pretty much wherever you would choose to dig a hole. Should I be worried my house is about to explode? Oh right, I should be worried about terrorists attacking it.

Please, provide some real evidence to such findings and perhaps I would

support it.

2004/G343

G343-

Date: 12/20/2004

First Name: John

Last Name: Gonsalves

Address: 535 East L St.

City: Benicia

State: CA

Zip Code: 94510

Topic: Aesthetics

Comments: Fourteen miles, that's a long way when it comes to visibility. That's how

far out Cabrillo Port will be. We won't have to see it, hear it, or deal with it in any way. During the construction phase we may have to deal with some discomforts, but how comfortable is a blackout? We can't have it all,

we have to support our best options.

2004/G377

G377-

DEC. 19. 2004 9:34PM 308772 NO. 430

USC6-2004-16877-692

I wanted to speak in support of the Cabrillo Deepwater LNG facility but was unable to at the hearing on Tuesday 11 -30 - 04 at the Oxnard Arts Center.

Please register my support for this project.

Mary Sonzales 1920 Dunsmair Oxnard, CA 93035

CONTRACTOR OF THE PROPERTY OF

Docket No. USCG-2004-16877 State Cleaninghouse No. 20044021107

Date: 12/19/2004

First Name: Dave

Last Name: Gordon

Address: 30524 Oakmont Way

City: Hayward

State: CA

Zip Code: 94544

Topic: Transportation

Comments: I was suprised to see the few impacts such a large project will have on

local traffic. Of course there will be some disruptions as pipeline is laid, but the proposed route is on less populated streets. This is in response to concerns brought up in the Spring meetings. I have children living in the area and while no one wants to have their day interupted by traffic, I will have to remind them the good it will bring to the state in the long run. As well, local governments will receive a fair amount of revenues from the project. It seems to be the least intrusive positive option we have right

now.

2004/G218

G218-

USCG-7004-16677-72| Source:

USCG Docket

Date:

I own a home in Southern California and strongly support this project and urge you to do the same. Please expedite all approvals and let's get this project

G447-

Date: 12/20/2004

First Name: Joseph

Last Name: Graham

Address: 9758 48 1/2 Road

City: Mesa

State: CO

Zip Code: 81643

Topic: Alternatives

Comments: I am excited about the prospect of having an LNG facility in Southern

California. Domestic drilling is harder than ever and here in Colorado, there is already enough pressure on the land and out resources. By importing from Australia (a long-term ally), I believe we would be helping

stabilize our economy by importing from a reliable source.

Please approve this project and take some pressure of those of us who

live in the Rocky Mountains

2004/G366

G366-1

Date: 12/20/2004

First Name: Rachele

Last Name: Grant

Address: 2917 C Street #183

City: San Diego

State: CA

Zip Code: 92120

Topic: Aesthetics

Comments: When you compare Cabrillo Port to other LNG projects, the officials at

BHPB definitely have a better feel for the pulse of Californians. We love our coastline and want to protect it. We want to do away with permanent structures, like oil platforms, not build new ones. It's great that BHP has decided to put this project far out at sea where no one can really see it, and made it a temporary structure that will last only as long as it is

needed.

Thanks for registering my support for this project.

2004/G349

G349-

Date: 12/17/2004

First Name: Gavin Last Name: Gray

Address: 17 Saddlebrook Ct.

City: Novato

State: CA

Zip Code: 94947

Topic: Alternatives

Comments: I was originally attracted to my current home near Marin, California for it's

natural beauty. I believe strongly in protecting the environment for our

children and grandchildren.

At the same time, I think some people take their environmental activism too far. It is unrealistic to think that the energy shortage in this state will solve itself. It is just as illogical to think the renewable resources like solar power will be enough to fill the gap.

In my research, I have found that LNG is one of the least harmful ways we can currently produce energy. It is clean burning and non toxic, both of which make it eco-friendly. For that reason, I feel we need to approve a LNG project in California.

When I looked at the alternatives, the Cabrillo Port facility makes the most sense. It's offshore location will have the least impact on the coastal ecosystem. Additionally, it is so far away that its visual impact will be miniscule.

For all these reasons, I think that the Cabrillo Port facility makes the most sense. We need to find common sense solutions to our energy problems like this one!

2004/G162

G162-1

Date: 12/19/2004

First Name: Donna

Last Name: Graystone

Address: 3548 Summersprings Dr.

City: Las Vegas

State: NV

Zip Code: 89129

Topic: Air Quality

Comments: Several California residents are against the Proposed Cabrillo Port

Project, but they need to look at the needs of everyone else as well. The air quality for one would better everyone. As well as getting a foundation for natural gas resources so that other places may benefit form the cheaper coast of NG. I'm for the Cabrillo port Project and look forward to

its completion

2004/G205

G205-1

12/20/04

California State Lands Commission 100 Howe Avenue, Suite 100-South Sacramento, CA 95825 Attn: Cy Oggins

G546-1 Regarding the proposed LNG Facility off the coast of Oxnard/Malibu . . . please stop this. Once this is in place, there is no turning back. It will be just the beginning of our lovely paradise being turned into the next El Segundo. At long last, the fine stewards of this community have managed to establish a Marine Sanctuary in our local waters. It should be obvious that this facility is not compatible with this preserve.

G546-2

G546-3

I am active with local wildlife rescue groups. I don't want to see an increase in traumatized, poisoned Marine life due to the unnatural impact of industry's trampling on this beautiful and fragile natural resource.

Respectfully submitted,

Lynn Griffin 25432 Malibu Rd. Malibu, CA 90265

Lgriffin1@charter.net

2004/G546

G546-1

Your statement is included in the public record and will be taken into account by decision-makers when they consider the proposed Project.

G546-2

The FSRU would be located outside of the current boundary of the Channel Islands National Marine Sanctuary (CINMS) and vessels associated with Cabrillo Port operations would not be expected to enter the CINMS. Sections 4.7.1.4, 4.13.2.2, and 4.20.1.5 discuss the potential expansion of the CINMS boundary, which is not proposed at this time. Sections 4.7.4, 4.15.4, 4.16.4, and 4.18.4 describe potential impacts on the marine environment and proposed mitigation measures to reduce those potential impacts.

G546-3

Section 4.7.4 contains information on potential impacts on marine biological resources and mitigation measures to address potential impacts.

Date: 12/16/2004

First Name: Paul

Last Name: Grimes

Title: Mr.

Address: 936 Moana Dr City: San Diego

State: CA

Zip Code: 92106

Phone No.: 619-223-8289

Email aquawise@cox.net

Address:

Topic: Energy and Minerals, Land Use, Other/General Comment

Comments: This project will provide California with much needed natural gas. The

population is growing and the shift to natural gas from other more polluting sources is in process. Additionally, natural gas powers many electrical generating stations, which are serving a growing population and increased demand, including new demand for alternative fuel vehicles. California will need both additional natural gas and additional power

plants to meet energy demands with clean burning fuels.

The location allows the operation to take place well away from the coast

and pipeline appears to be intentionally placed between cities of

Oxnard/Camarillo and Newhall/Santa Clarita.

Please apporove this proposal so that our natural energy demands can

be met and prices of natural gas and prices of goods and services

provided by natural gas can stay affordable.

2004/G063

G063-1

Date: 12/16/2004

First Name: Niclole

Last Name: Grondin

Address: 6911 Alvarado Rd #24

City: San Diego

State: CA

Zip Code: 92120

Topic: Alternatives

Comments: In Ventura County, we are well aware of the alternatives to Cabrillo Port,

because one is located right here. The differences are striking. Cabrillo Port is a temporary, floating structure which is almost invisible from the coastline, while the alternative just further extends the life of an oil platform that has been an eyesore for the community for years. We know

about the alternatives, and that's why you have to support Cabrillo Port."

I respectfully support this project.

2004/G052

G052-1

Date: 12/17/2004

First Name: Joshua

Last Name: Gross

Address: 1862 Tavern Ct

City: Alpine

State: CA

Zip Code: 91901

Topic: Energy and Minerals

Comments: California is the second largest natural gas consumer in the nation, if we

don't do something NOW to increase the available supply of natural gas, then we are going to end up paying the cost later. We should have learned our lesson from the electricity deregulation crisis. I support the

Cabrillo Deepwater Port.

2004/G155

G155-1

Date: 12/20/2004

First Name: Mary

Last Name: Grove

Address: 2917 C Street # 183

City: San Diego

State: CA

Zip Code: 92120

Topic: Energy and Minerals

Comments: Some day, California will not need fossil fuels. But until that day comes,

relying exclusively on renewable resources for energy is not realistic. We need affordable natural gas to warm our homes and power our electricity generation in California, and the Cabrillo Port is one way to make that

happen

2004/G378

G378-1

Date: 12/20/2004

First Name: Natalie

Last Name: Grove

Address: 2917 C Street # 183

City: San Diego

State: CA

Zip Code: 92120

Topic: Alternatives

Comments: Part of the reason California needs more natural gas is because it is a

clean-burning source of power. It only makes sense, then, that a Natural Gas importation facility like Cabrillo Port use natural gas, instead of diesel, to power it boats. I'm glad to see BHP is taking this simple, logical

measure to protect our environment.

Right now many tankers and tug boats use dirty diesel fuel. This project

would use only natural gas to power its tankers and tug boats. For the

sake of our environment, please approve this project.

2004/G375

G375-